

REDACTED

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

In the Matter of the Search of)

(Briefly describe the property to be searched)

or identify the person by name and address))

Case No. 2:17sw 13

Information associated with Google, Inc. account)

██████████@gmail.com that is or was stored at premises)

owned, maintained, controlled, or operated by Google, Inc.,)

a company whose custodian of records is located at)

1600 Amphitheatre Parkway, Mountain View, CA 94043)

(Pursuant to 18 U.S.C. § 2703 and Fed. R. Crim. P. 41.))

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*): **See Attachment A.**

located in the Northern District of California, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

☒ evidence of a crime;

☒ contraband, fruits of crime, or other items illegally possessed;

☒ property designed for use, intended for use, or used in committing a crime;

☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section(s)

Offense Description

18 U.S.C. § 2339B(a)(1)

Attempting to provide material support to a designated foreign-terrorist organization

The application is based on these facts: **See Affidavit.**

☒ Continued on the attached sheet.

☐ Delayed notice of ____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

REVIEWED AND APPROVED:

Andrew Bosse

Assistant United States Attorney

Applicant's signature

Task Force Officer Rachelann Cain, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: _____

Judge's signature

City and state: _____

Printed name and title

REDACTED

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the email address

██████████.gmail.com that is stored at premises controlled by Google, Inc., a company that accepts service of legal process at 1600 Amphitheatre Parkway, Mountain View, CA 94043.

REDACTED

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Google, Inc. (the “Provider”)

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, including any emails, records, files, logs, or information that has been deleted but is still available to the Provider, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose the following information to the government for each account or identifier listed in Attachment A, from the time period running from December 1, 2015, through December 31, 2016:

- a. The contents of all e-mails associated with the account, including stored or preserved copies of e-mails sent to and from the account, draft e-mails, the source and destination addresses associated with each e-mail, the date and time at which each e-mail was sent, and the size and length of each e-mail;
- b. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);
- c. The types of service utilized;
- d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, email and email attachments, Google Cloud documents, Google Drive documents, calendar data, pictures, and files; and

e. All records pertaining to communications between the Provider and any person regarding the account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of Title 18, United States Code, Section 2339B, Attempting to provide material support or resources to a designated foreign-terrorist organization, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- a. any communication made with terrorists, foreign terrorist organizations, or supporters of such terrorists and foreign terrorist organizations;
- b. any information related to terrorists and foreign terrorist organizations, including information related to the provision of support to such terrorists and foreign terrorist organizations, and identifying information relating to such terrorists and foreign terrorist organizations, including names, addresses, phone numbers, screen names, email addresses, other electronic communication application contact information, or any other identifying information;
- c. any viewed or stored media, manuals, directives, or propaganda relating to terrorists and foreign terrorist organizations, or the provision of support to terrorists and foreign terrorist organizations;
- d. lists of contacts and related identifying information;
- e. any information relating to international travel or planned international travel;

- f. any bank records, checks, credit-card bills, account information, money transfer orders or receipts, debit cards, prepaid cards, and other financial records or information;
- g. any information relating to materials that could be used to support, or conduct, a terrorist attack, including weapons, ammunition, precursor chemicals, and communications equipment;
- h. the identities of coconspirators and other individuals engaged, or otherwise involved, in providing, or attempting to provide, material support or resources to a foreign-terrorist organization;
- i. the identifying and contact information of coconspirators and other individuals engaged, or otherwise involved, in providing, or attempting to provide, material support or resources to a foreign-terrorist organization;
- j. the timing of communications among coconspirators and other individuals engaged, or otherwise involved, in providing, or attempting to provide, material support or resources to a foreign-terrorist organization;
- k. the methods and techniques used in providing, or attempting to provide, material support or resources to a foreign-terrorist organization;
- l. the distribution of videos and photographs evidencing the work, accomplishments, or propaganda of the foreign-terrorist organization;
- m. the recruitment of additional fighters, supporters, and financial support for the foreign-terrorist organization; and
- n. information relating to who created, used, or communicated with the account, including records about their identities and whereabouts.

REDACTED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
[REDACTED] GMAIL.COM THAT IS
STORED AT PREMISES CONTROLLED
BY GOOGLE, INC.

Case No. 2:17sw 13

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Task Force Officer Rachelann Cain, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with an account that is stored at premises controlled by Google, Inc., an electronic services provider headquartered at 1600 Amphitheatre Parkway Mountain View, CA 94043. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Google, Inc., which owns the email service known as Gmail, to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

2. I am Task Force Officer (TFO) Rachelann Cain with the Federal Bureau of Investigation (FBI), and have been since June of 2015. I have been assigned to the Norfolk FBI Joint Terrorism Task Force (JTTF) since June of 2015, and I am a sworn United States Deputy Marshal. I have been employed by the City of Suffolk Police Department in Suffolk, Virginia,

since March of 2009. After an assignment to Uniform Patrol, I was promoted to Detective in June of 2012. While in the Detective Bureau, I was assigned to work violent crimes, including homicides, child abuse, and other violent crimes. I have conducted numerous felony investigations, conducted physical surveillance, executed search warrants, executed probable cause arrests, and used other investigative techniques to secure relevant information regarding various crimes for investigations. Since assigned to the JTTF, I have worked counterterrorism investigations. The facts set forth in this affidavit are based upon my personal knowledge, my training and experience, and information obtained from FBI Special Agents, Task Force Officers, witnesses, reports, and other sources. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. Unless specifically indicated, all conversations and statements described in this affidavit are related in sum and substance and in part only, and are not intended to be a verbatim recitation of such statements.

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. LIONEL NELSON WILLIAMS, the user of the email address that is the target of this search warrant, was indicted for attempting to provide material support to a designated foreign-terrorist organization, pursuant to Title 18, United States Code, Section 2339B(a)(1), on January 4, 2017. *See* Crim. Case No. 2:17cr1. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to search the information described in Attachment A for additional evidence of the charged crime, as further described in Attachment B.

RELEVANT LAW

5. I am advised that Title 18, U.S.C. Section 2339B - Providing material support or resources to designated foreign terrorist organizations - provides in pertinent part:

(a) Prohibited activities. - (1) Unlawful conduct. - Whoever knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so, shall be fined under this title or imprisoned not more than 20 years, or both, and, if the death of any person results, shall be imprisoned for any term of years or for life. To violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization (as defined in subsection (g)(6)), that the organization has engaged or engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), or that the organization has engaged or engages in terrorism (as defined in section 140(d) (2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

I am also advised that Title 18 U.S.C. Section 2339A(b)(1) provides, in pertinent part:

The term “material support or resources” means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safe houses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.

JURISDICTION

6. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

THE ISLAMIC STATE OF IRAQ AND THE LEVANT

7. On October 15, 2004, the United States Secretary of State designated Al-Qaeda in Iraq (AQI), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and Specifically Designated Global Terrorist under section 1(b) of Executive Order 13224.

8. On May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and Specifically Designated Global Terrorist under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al'Sham (ISIS), the Islamic State of Iraq and Syria (ISIS), ad-Dawla al'Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. In an audio recording publically released on June 29, 2014, ISIL announced a formal change of ISIL's name to the Islamic State (IS). On or about September 21, 2014, now-deceased ISIL spokesman Abu Muhammad al-Adnani called for attacks against citizens—military or civilian—of the countries participating in the United States-led Coalition against ISIL. On September 21, 2015, the Secretary added the following aliases to the ISIL listing: Islamic State, ISIL, and ISIS. To date, ISIL remains a designated FTO.

PROBABLE CAUSE

9. In or around late March, 2016, a member of the public advised the FBI that a former associate, later identified as WILLIAMS, had recently been posting ISIL videos and content about the support of ISIL on WILLIAMS' Facebook page. The complainant also stated that WILLIAMS had recently acquired an AK-47 assault rifle. The complainant provided partial identifying information for WILLIAMS and provided FBI with information about the Facebook account showing the ISIL postings.

10. FBI review of the publicly viewable Facebook page and subsequent investigation revealed that WILLIAMS was the user of the Facebook account, which at that time had the username of Harun Ash-Shababi and an account number of [REDACTED] FBI review of the account revealed that on or about March 14, 2016, WILLIAMS posted: "The Jihad (the struggle) doesn't end just because it stops feeling good." WILLIAMS included a video of a

lecture by Anwar al-Awlaki in the post. Awlaki is known to your affiant to be a reference to now deceased Al-Qaeda in the Arabian Peninsula member and leader Anwar al Awlaki.

11. On or about March 16, 2016, WILLIAMS posted on his Facebook page: “It’s time for me to take a stand. I stand with #Dawlah¹. If that means you want nothing to do with me, then fine.” Your affiant assesses that WILLIAMS pledged his allegiance to ISIL with his post.

12. On or about March 20, 2016, WILLIAMS shared a video posted by someone else and commented, “I love this video. I love the Mujahideen² the world over. Youtube/Facebook had the gall to delete it sometime ago, but somehow it’s been remade/reuploaded. Allahu Akhbar!” The video contained the watermark of al-Hayat, known to your affiant to be ISIL’s Western-focused official media arm. FBI review of the video revealed a speaker who condemned Muslims who sided with Western states and Muslims who did not provide support for the Mujahideen.

13. On or about March 21, 2016, WILLIAMS “liked” a post by another Facebook user that stated: “The lone wolf attacks are more beloved to us than the martyrdom operations, For the impact of the lone wolf attacks in the lands of the enemy cause more terror in their hearts and give them a taste of the havoc they rain upon our families in different Muslim lands! #KillThemWhereverYouFindThem”.³ On or about March 21, 2016, WILLIAMS posted a comment in response to this post that expressed his support for the targeting of police officers,

¹ “Dawlah” is an Arabic term that means “state.” Your affiant is aware that ISIL members and supporters refer to ISIL as “Dawlah,” which is short for Dawla al Islamiya, or Islamic State.

² “Mujahedeen” is an Arabic term for Islamic fighters engaged in jihad.

³ Quoted language is recited verbatim, and includes any typographical errors included in the original communication.

military, and armed civilians.

14. A query of the Commonwealth of Virginia Department of State Police Firearms Transactions Log revealed that WILLIAMS purchased a weapon on or about December 12, 2015. Subsequent investigation and interviews determined that WILLIAMS ordered an AK-47 assault rifle from an online firearms dealer on December 3, 2015. Your affiant notes that this is the day after the terror attack in San Bernardino, California. The weapon was shipped to a firearms dealer in Suffolk, Virginia, where WILLIAMS picked it up on or about December 12, 2015. During the course of the investigation, FBI agents learned that WILLIAMS kept the AK-47 on the dresser in his bedroom.

15. On or about January 13, 2016, an unidentified person near WILLIAMS' residence called the Suffolk Police Department to complain of hearing gunshots, and stated that he/she also had heard gunshots during the past several afternoons. Investigation by the Suffolk Police Department revealed that WILLIAMS had been target practicing in a field near his residence. In addition, on or about April 25, 2016, FBI aerial surveillance observed two individuals depart WILLIAMS' residence and walk to a nearby series of outbuildings on the property believed by your affiant to be owned and maintained by WILLIAMS and his family. The infrared video then captured what appeared to be muzzle-flashes consistent with individuals firing guns.

16. On or about March 23, 2016, your affiant requested an emergency disclosure from Facebook for the account Harun Ash-Shababi, harun.alamriki, [REDACTED] Facebook responded with the following account information: Registered name of Harun Ash-Shababi, registered email addresses [REDACTED]aol.com and [REDACTED]gmail.com. Using that information, the FBI identified the owner of the accounts as Lionel Nelson Williams. As discussed below, WILLIAMS used his Facebook accounts to communicate with likeminded individuals and post extremist content. Your affiant knows that Facebook routinely sends

notification emails to registered email accounts linked to Facebook accounts to notify users of posts, private messages, and account information. Such information, which would be included in the content of WILLIAMS' emails, is relevant and material to the investigation and to the charge pending against WILLIAMS.

17. In late April 2016, an FBI controlled persona (Persona-1) "friended" WILLIAMS on Facebook. On or about May 16, 2016, Persona-1 told WILLIAMS he/she would be in the Baltimore, MD, area for Ramadan. WILLIAMS informed Persona-1 that he would be in the Washington, DC, area and that they may be able to meet. On May 16, 2016, in a Facebook private message conversation, WILLIAMS told Persona-1: "I can't wait for the day that the black flag of Islam exists all over Maryland, D.C., Virginia, and Chicago."

18. On or about June 13, 2016, WILLIAMS met with an FBI Undercover Employee (UCE).⁴ During this meeting, WILLIAMS stated that he supports attacks on "hard targets." Based on his electronic communications with Persona-1, your affiant believes "hard targets" means police officers, military targets, and other targets that have the ability to defend themselves. WILLIAMS stated that if he were to conduct an attack, he would target someone who could fight back. WILLIAMS claimed that he had not carried out an attack because his grandmother is still alive and he needs to care for her.

19. In or about August 2016, Persona-1 offered to provide WILLIAMS with a "smartphone" mobile device so that they could communicate on an encrypted messaging application. WILLIAMS accepted Persona-1's offer and was mailed a Samsung smartphone.

20. On or about September 12, 2016, in a conversation with Persona-1 on an

⁴ Unless otherwise noted, all in-person and telephonic interactions between WILLIAMS and the UCE were consensually recorded.

encrypted messaging application, WILLIAMS told Persona-1 that “the advent of Dawlah really gave my life a place and a purpose. It’s a home and example for the ummah.”⁵ On or about September 14, 2016, in a conversation with Persona-1 on an encrypted messaging application, in response to a question about what WILLIAMS believed his role would be, WILLIAMS stated that he desires “to be a doctor/surgeon for my ummah and the Mujahideen.” During the course of the investigation, WILLIAMS had also expressed a desire to help “widows and orphans.” Persona-1 informed WILLIAMS that s/he was collecting money to help “our Dawlah brothers,” *i.e.*, the Islamic State, and WILLIAMS agreed to contribute money. WILLIAMS asked whether the money would go to help “Poor Brothers” in need of charity. Persona-1 specified that in fact the money would be going to “the lions of Mosul”; a phrase used to describe ISIL fighters in Mosul, a city in Iraq then under the control of ISIL.

21. On or about September 24, 2016, in a conversation with Persona-1 on an encrypted messaging application, WILLIAMS expressed his excitement to see Persona-1 in person and to contribute. WILLIAMS stated “I am getting very excited. Indeed to do this for my Deen and my umma,” which your affiant believes to mean, *for my religion and my nation*. WILLIAMS went on to state, “I don’t want to be like the ones who scream and chant but the end of the day, they are nothing but kittens.”

22. On or about October 8, 2016, the UCE met WILLIAMS in Hampton Roads, Virginia. During the face-to-face meeting, WILLIAMS pulled a pistol from his waistband and secured it in the glove compartment of the vehicle he was driving. During that meeting, the UCE explained that WILLIAMS could only contribute if he knew where the money was going. The

⁵ “Ummah” is an Arabic term that means “Nation”; as used in this context, your affiant understands it to mean the worldwide community of Muslims.

UCE stated that the money was “going to the Islamic State. You understand this. And it’s going to kill people, do you understand?” The UCE additionally specified that the money was going to the “lions of Mosul.” The UCE provided WILLIAMS with contact information for an individual who was purportedly an ISIL financier and whom WILLIAMS believed was collecting money for ISIL. In fact, the individual was an FBI controlled persona (Persona-2)⁶ that WILLIAMS could contact using an encrypted messaging application.

23. On or about October 10, 2016, WILLIAMS contacted Persona-2, whose contact information the UCE had supplied him with, and provided Persona-2 with the account information that would allow Persona-2 to access the funds on a \$200 prepaid cash card that WILLIAMS had obtained. Bank records from WILLIAMS obtained during the investigation showed that WILLIAMS had limited monetary means during this time period.

24. On or about October 17, 2016, in a conversation with Persona-1 on an encrypted messaging application, Persona-1 asked WILLIAMS if he wanted to see what his money helped purchase. Persona-1 sent WILLIAMS a picture of what appeared to be a rocket propelled grenade. WILLIAMS responded “Alhamdulillah wa AllahuAkhbar :),” which your affiant believes to mean *Praise God and God is great*. Immediately afterwards, Williams stated, “I’m gonna destroy this message then hit you back.” Your affiant believes WILLIAMS attempted to use a feature in the encrypted messaging application to destroy the message he had received

⁶ The electronic communications of Persona 1 and Persona 2 were controlled by the same FBI employee. Your affiant has reason to believe that this FBI employee was interviewed by FBI agents in 2012 on an unrelated matter and asked if the FBI employee had improperly disclosed information to a third party. The FBI employee initially denied disclosing the information, but after being confronted with additional evidence, the employee immediately admitted the disclosure. Your affiant also states that all of the communications between WILLIAMS and the FBI employee in question were electronic and, therefore, recorded.

about the rocket propelled grenade.

25. On or about October 30, 2016, during a conversation between WILLIAMS and Persona-1 on an encrypted messaging application, Persona-1 informed WILLIAMS that s/he was currently physically in territory controlled by ISIL and was trying to purchase 10,000 rounds of AK-47 ammunition and 50 magazines. WILLIAMS inquired how much that amount of ammunition would cost in the territory controlled by ISIL and stated he would try to help.

26. On or about November 3, 2016, in a conversation with Persona-1 on an encrypted messaging application, WILLIAMS agreed to send money that he believed would help purchase ammunition for ISIL fighters. Persona-1 sent WILLIAMS the name of an individual in the Middle East to whom WILLIAMS should send the money to facilitate Persona-1 purchasing ammunition for ISIL, as they had discussed. The same day, WILLIAMS sent \$50.00 using an electronic transfer service to the individual in the Middle East whose contact information Persona-1 had provided. WILLIAMS then sent Persona-1 the details of that transaction using an encrypted messaging application. In fact, the money did not go to an individual in the Middle East and is being held for seizure by the United States.

27. During the course of the investigation, WILLIAMS discussed at various times with Persona-1 the feasibility and desirability of conducting “martyrdom operations.” WILLIAMS stated that he was unsure whether his intentions were “pure” enough such that, if he carried out a violent act resulting in his death—*i.e.*, a “martyrdom operation”—his death would be considered a martyrdom rather than a suicide. Starting in or around the last week of November 2016, WILLIAMS told Persona-1 about a possible marriage arrangement with a woman residing outside of the United States; he discussed the possible marriage arrangement and his belief that such an arrangement would ensure his “purity” such that any martyrdom operation he carried out would lead to his true martyrdom, rather than simply his suicide.

28. On or about December 19, 2016, WILLIAMS wrote to Persona-1 that, “After the Sister desired to marry me, it made my life worth living., so I was able to safely make the intention in my heart to go forth. In’shaa’Allahit will be very soon. I’ve been preparing. I need to be married first.” WILLIAMS wrote to Persona-1 that, “After I marry and I acquire all my tools I’ll be going forth in’shaa’Allah, with or without.” In a message to Persona-1 later the same day, WILLIAMS stated that “[t]he next time I see her⁷ will be in Jannah, in’shaa’Allah.” Your affiant understands “Jannah” to be an Arabic term for “heaven.”

29. During the same conversation, WILLIAMS told Persona-1 that Persona-2 had contacted him recently. WILLIAMS told Persona-1 that he planned to “empty some of my money towards the cause before I go, *God-willing*.” He continued explaining his plan to, in sum and substance, die without a single dollar in his pocket. During the same conversation, Persona-1 asked WILLIAMS whether his plan for an operation was “for a local.” WILLIAMS responded in the affirmative, stating that that was “[t]he only way.” Your affiant believes that, in making these statements, it appears that WILLIAMS may have been moving closer to committing an attack that would result in his death. On December 21, 2016, WILLIAMS was arrested pursuant to a criminal complaint alleging one count of Attempting to Provide Material Support to a Foreign Terrorist Organization in violation of 18 U.S.C. § 2339B.

30. Based on my training and experience, I know that a search of email used by a suspect in cases of this kind often yields investigative leads and evidence relating to:

⁷ *I.e.*, his intended wife.

- a. The identities of coconspirators and other individuals engaged, or otherwise involved, in providing, or attempting to provide, material support or resources to a foreign-terrorist organization;
- b. The identifying and contact information of coconspirators and other individuals engaged, or otherwise involved, in providing, or attempting to provide, material support or resources to a foreign-terrorist organization;
- c. The timing of communications among coconspirators and other individuals engaged, or otherwise involved, in providing, or attempting to provide, material support or resources to a foreign-terrorist organization;
- d. The methods and techniques used in providing, or attempting to provide, material support or resources to a foreign-terrorist organization;
- e. Arrangements for travel and meetings;
- f. The distribution of videos and photographs evidencing the work, accomplishments, or propaganda of the foreign-terrorist organization; and
- g. The recruitment of additional fighters, supporters, and financial support for the foreign-terrorist organization.

31. In particular, based on my training and experience, I have learned that Facebook sends certain notifications to the email address or addresses associated with particular Facebook accounts. As discussed in paragraph 12¹² above, a Facebook account used by WILLIAMS to post ISIL-related content, identified using the Facebook name Harun Ash-Shababi, Facebook account number [REDACTED] was associated with the registered email addresses [REDACTED]@aol.com and [REDACTED]@gmail.com (the account targeted by this requested search warrant). Thus, it is reasonable to believe that Facebook notifications related to the Harun Ash-Shababi account were sent to WILLIAMS at those associated email addresses. Such

notifications may contain information about private messages received, posts that the account holder was “tagged” in, and messages that appeared on the Facebook account “wall.”

32. Additionally, during the course of the investigation, the FBI determined that WILLIAMS sent email messages to his friends, using the same email addresses listed above, in an attempt to convert them to Islam. Those messages included videos of Anwar Al-Awlaki, discussed in paragraph 8^{10 12} above.

THE ISLAMIC STATE OF IRAQ AND THE LEVANT

33. On October 15, 2004, the United States Secretary of State designated Al-Qaeda in Iraq (AQI), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and Specifically Designated Global Terrorist under section 1(b) of Executive Order 13224.

34. On May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and Specifically Designated Global Terrorist under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al’Sham (ISIS), the Islamic State of Iraq and Syria (ISIS), ad-Dawla al’Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. In an audio recording publically released on June 29, 2014, ISIL announced a formal change of ISIL’s name to the Islamic State (IS). On or about September 21, 2014, now-deceased ISIL spokesman Abu Muhammad al-Adnani called for attacks against citizens—military or civilian—of the countries participating in the United States-led Coalition against ISIL. On September 21, 2015, the Secretary added the following aliases to the ISIL listing: Islamic State, ISIL, and ISIS. To date, ISIL remains a designated FTO.

BACKGROUND CONCERNING E-MAIL

35. In my training and experience, I have learned that Google, Inc., provides a variety of on-line services, including electronic mail ("e-mail") access, to the public. Google, Inc.'s email service, Gmail, allows subscribers to obtain e-mail accounts at the domain name www.gmail.com, like the e-mail account listed in Attachment A. Subscribers obtain an account by registering with Gmail. During the registration process, Google, Inc. asks subscribers to provide basic personal information. Therefore, the computers of Google, Inc. are likely to contain stored electronic communications (including retrieved and unretrieved e-mail for Gmail subscribers) and information concerning subscribers and their use of Google, Inc. services, such as account access information, e-mail transaction information, and account application information. In my training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.

36. A Google, Inc. subscriber can also store with the provider files in addition to e-mails, such as address books, contact or buddy lists, calendar data, pictures (other than ones attached to e-mails), Google Cloud, Google Drive, and other files, on servers maintained and/or owned by Google, Inc. In my training and experience, evidence of who was using an e-mail account may be found in address books, contact or buddy lists, e-mail in the account, Google Cloud files, Google Drive files, and attachments to e-mails, including pictures and files.

37. In my training and experience, e-mail providers generally ask their subscribers to provide certain personal identifying information when registering for an e-mail account. Such information can include the subscriber's full name, physical address, telephone numbers and other identifiers, alternative e-mail addresses, and, for paying subscribers, means and source of payment (including any credit or bank account number). In my training and experience, such

information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.

38. In my training and experience, e-mail providers typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (*i.e.*, session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account via the provider's website), and other log files that reflect usage of the account. In addition, e-mail providers often have records of the Internet Protocol address ("IP address") used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the e-mail account.

39. In my training and experience, in some cases, e-mail account users will communicate directly with an e-mail service provider about issues relating to the account, such as technical problems, billing inquiries, or complaints from other users. E-mail providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records of any actions taken by the provider or user as a result of the communications. In my training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.

40. In general, an e-mail that is sent to a Gmail subscriber is stored in the subscriber's "mail box" on Google, Inc. servers until the subscriber deletes the e-mail. If the subscriber does not delete the message, the message can remain on Google, Inc. servers indefinitely. Even if the

subscriber deletes the e-mail, it may continue to be available on Google, Inc.'s servers for a certain period of time.

CONCLUSION

41. Based on the forgoing, I request that the Court issue the proposed search warrant. Because the warrant will be served on Google, Inc., which will then compile the requested records at a time convenient to it, there exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.

Task Force Officer Rachelann Cain
Federal Bureau of Investigation

Sworn and subscribed to before me on this _____ day of February 2017.

United States Magistrate Judge
Norfolk, Virginia